

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

LIFEBRITE HOSPITAL GROUP OF
STOKES, LLC,

Plaintiff,

v.

BLUE CROSS AND BLUE SHIELD OF
NORTH CAROLINA,

Defendant.

Case No.: 1:18-00293-WO-LPA

BLUE CROSS AND BLUE SHIELD OF
NORTH CAROLINA,

Counterclaim Plaintiff,

v.

LIFEBRITE HOSPITAL GROUP OF
STOKES, LLC; LIFEBRITE
HOSPITAL GROUP, LLC;
LIFEBRITE LABORATORIES, LLC;
CHRISTIAN FLETCHER; and AMBER
FLETCHER,

Counterclaim Defendants.

DECLARATION OF JEFFREY S. GLEASON IN SUPPORT OF BLUE CROSS
AND BLUE SHIELD OF NORTH CAROLINA'S MOTION FOR SANCTIONS

I, Jeffrey S. Gleason, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at Robins Kaplan, LLP, counsel to Blue Cross and Blue Shield of North Carolina ("Blue Cross NC") in the above-captioned proceeding.

2. Attached hereto as Exhibit 1 is a true and correct copy of excerpts of the deposition transcript for LifeBrite Hospital Group of Stokes, LLC 30(b)(6) deposition through its Corporate Representative Christian Fletcher on March 13, 2025, specifically pages 21, 176, 271, and 348-54.

3. Attached hereto as Exhibit 2 is a true and correct copy of correspondence from Jeffrey Gleason to Steven E. Holtshouser, dated September 29, 2023.

4. Attached hereto as Exhibit 3 is a true and correct copy of correspondence from Steven E. Holtshouser to Jeffrey Gleason, dated October 6, 2023.

5. Attached hereto as Exhibit 4 is a true and correct copy of correspondence from Steven E. Holtshouser to Jeffrey Gleason, dated October 26, 2023.

6. Attached hereto as Exhibit 5 is a true and correct copy of correspondence from Steven E. Holtshouser to Jeffrey

Gleason, dated November 1, 2023.

7. Attached hereto as Exhibit 6 is a true and correct copy of correspondence from Steven E. Holtshouser to Jeffrey Gleason, dated November 8, 2023.

8. Attached hereto as Exhibit 7 is a true and correct copy of correspondence from Jeffrey Gleason to Ronald Marney, dated September 17, 2024.

9. Attached hereto as Exhibit 8 is a true and correct copy of correspondence from Ronald Marney to Jeffrey Gleason (erroneously addressed to James Gleason), dated October 22, 2024.

10. Attached hereto as Exhibit 9 is a true and correct copy of LifeBrite Hospital Group of Stokes, LLC's Supplemental Responses and Objections to Blue Cross and Blue Shield of NC's Second Set of Interrogatories, dated June 14, 2024.

11. Attached hereto as Exhibit 10 is a true and correct copy of excerpts of the Transcript of Motion Hearing Before the Honorable William L. Osteen, Jr., dated April 29, 2024, specifically pages 13-16.

12. Attached hereto as Exhibit 11 is a true and correct

copy of excerpts of the Transcript of Motion Hearing Before the Honorable William L. Osteen, Jr., dated April 30, 2024, specifically pages 14-19 and 22-23.

13. Attached hereto as Exhibit 12 is a true and correct copy of correspondence from Ronald Marney to Jeffrey Gleason (erroneously addressed to James Gleason) enclosing a hard drive containing the purported LifeBrite Labs and LifeBrite Hospital LIS Systems and HL7 Data, dated July 10, 2024.

14. Attached hereto as Exhibit 13 is a true and correct copy of email correspondence from Jeffrey Gleason to all counsel, preparing for a Meet and Confer, dated December 5, 2024.

15. Attached hereto as Exhibit 14 is a true and correct copy of email correspondence from Jeffrey Gleason to all counsel dated December 18, 2024.

16. Attached hereto as Exhibit 15 is a true and correct copy of email correspondence from Jeffrey Gleason to all counsel dated January 7, 2025.

17. Attached hereto as Exhibit 16 is a true and correct copy of email correspondence from Ronald Marney to all counsel dated January 12, 2025.

18. Attached hereto as Exhibit 17 is a true and correct copy of email correspondence from Jeffrey Gleason to all counsel dated January 21, 2025.

19. Attached hereto as Exhibit 18 is a slip sheet. A true and correct copy of the document produced confidential by the LifeBrite Parties as LIFEBSITE 0845169, depicting the interface of the Avalon LIS used by LifeBrite Labs as it appeared in the ordinary course of business, will be filed pending the Court's determination of its motion for leave to file certain documents under seal.

20. Attached hereto as Exhibit 19 is a true and correct copy of LifeBrite Hospital Group of Stokes, LLC's Second Supplemental Responses and Objections to Blue Cross and Blue Shield of NC's Second Set of Interrogatories, dated June 14, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in Minneapolis, Minnesota this April 25, 2025.

By: /s/Jeffrey S. Gleason
Jeffrey S. Gleason

CERTIFICATE OF SERVICE

I hereby certify that on, April 25, 2025, the
**DECLARATION OF JEFFREY S. GLEASON IN SUPPORT OF BLUE CROSS
NC'S MOTION FOR SANCTIONS** was electronically filed with the
Clerk of Court using the CM/ECF system, which will send
notification of such filing to all attorneys of record.

/s/ Jeffrey S. Gleason